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December 30, 2005

Mr. Michael Barton  
Commissioner  
Department of Transportation and Public Facilities  
3132 Channel Drive  
Juneau, Alaska 99801-7898

RE: Comments on 2006-2008 Draft STIP

Dear Commissioner Barton:

Thank you for the opportunity to comment on the state of Alaska, Department of Transportation and Public Facilities' 2006-2008 Draft STIP. South Central Alaska has the vast majority of vehicle miles traveled, congested roadways, and traffic fatalities and accidents. It is vital that continued progress be made to improve the road network in this region. In recognition of these facts, the municipalities of Anchorage, Matanuska-Susitna, and Kenai Peninsula have joined together to submit mutual comments on the Draft STIP. Each municipality will also submit more specific comments related to the impact of the Draft STIP within the individual municipal boundaries.

The proposed Draft STIP neglects to provide acceptable progress for the roads in this region. Indeed, as the Draft STIP focuses resources on new projects it forces projects that have languished for years backwards. The Draft STIP proposes significant delays to critically needed road improvement that will result in unacceptable increases in fatalities, congestion, and maintenance costs. While we understand how the shortage of Highway Trust Funds and large federal earmarks reduces the amount of funds available for STIP projects we do not agree with the proposed allocations. A more acceptable solution is to reduce allocations to new large-scale projects and extend the phasing of these projects. This will allow previously programmed projects to move forward while still preparing for the future. Frankly, the position of the STIP to Advance Construct (AC) over \$434,000,000 in 2006 has two major drawbacks to our region and the state. First, it holds over \$400M in funding that cannot otherwise be programmed for projects ready for construction. Second, it reduces the total allocation available to be programmed in future years towards major construction efforts. Overall, it appears that the proposed Advance Construction consumes the majority of allocations previously afforded to the south central region.

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We also recommend that state general revenue funds be allocated to fill a portion of the fiscal void caused by these new efforts that require extraordinary financial investments. Moreover, major new starts should be seriously reconsidered in light of the significant delays they will cause to improvements in the state's road system.

We would like to express our appreciation as to the new format of the STIP and the method in which projects are illustrated. However, the format of the Draft STIP does not allow for regional comparisons. As mayors representing the most populous region of the state, we need to be assured that the region with the highest fatality rates and highest vehicle miles traveled is receiving an equitable portion of limited highway funds. The present formatting of the Draft STIP does not allow us to make this assessment.

The funding formula for MPO allocations should also include vehicle miles traveled. Merely relying on centerline mileage does not address usage and the associated costs, such as repavement needs and safety improvements.

It is difficult to determine where the Department has decided to expend the CMAQ discretionary funds within the Draft STIP. We request that the Department identify where all CMAQ funding has been allocated, by community, and also identify the source of local match for each project as required by the Department's Policy and Procedure No. 09.01.140.

As noted in the Draft STIP, the distribution of CMAQ funds is based on the fact that rural areas of Alaska experience high concentrations of particulates, most from road dust. Our municipalities continue to experience air quality problems due to road dust as well. We therefore request that discretionary CMAQ funds also be allocated to our municipalities to improve air quality.

To summarize, we find that the Draft STIP will have a devastating impact on our communities at a time when we all need to fix our roads and increase the capacity of our existing infrastructure that is needed TODAY. The Draft STIP should be revised so that important investments are not delayed. Improving traffic safety and reducing traffic congestion should be of utmost importance, yet the Draft STIP ignores these critical issues.

In closing we ask that the Draft STIP be revised to accomplish the following:

1. Restore funding to all previously programmed road projects to eliminate the proposed delays;
2. Extend the phasing of large projects to reduce the financial impact to previously programmed projects;
3. Complete and publish cost effectiveness calculations as required by state statute;
4. Utilize vehicle miles traveled in the calculation of MPO allocations;
5. Provide municipalities in South Central Alaska an opportunity to use CMAQ discretionary funds to reduce road dust;
6. Revise the relevant text regarding Congressional Earmarks and explain how they are to be programmed and why.



Thank you once again for the opportunity to review and comment on the Draft STIP. We look forward to working with the Department to develop a STIP that improves traffic safety, reduces congestion, and enhances our economy.

Sincerely,



Tim Anderson  
Mayor  
Matanuska-Susitna Borough



Mark Begich  
Mayor  
Municipality of Anchorage



John Williams  
Mayor  
Kenai Peninsula Borough

JD:ds